

KLETT ROONEY LIEBER & SCHORLING

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

12TH FLOOR, TWO LOGAN SQUARE
PHILADELPHIA, PENNSYLVANIA 19103-2756
TELEPHONE (215) 567-7500

Raymond A. Kresge
(215) 567-7745
rakresge@klettrooney.com

FACSIMILE (215) 567-2737

April 11, 2003

Via Hand Delivery

Hugh J. Hutchison, Esquire
Leonard, Tillery & Sciolla, LLP
1515 Market Street
Suite 1800
Philadelphia, PA 19102

Re: Lin v. Rohm and Haas Company,
Civil No. 02-3612

Dear Hugh:

Enclosed are: (1) Defendant's Initial Disclosures; (2) Defendant's First Set of Interrogatories; (3) Defendant's First Set of Document Requests; (4) Notice of Deposition for Plaintiff; and (5) three blank authorizations for release of records. As to plaintiff's deposition, I selected May 29. If that date is not available for you or Dr. Lin, please let me know as soon as possible. As to the authorizations, if Dr. Lin would identify any psychiatrist, psychologist or other health care provider in response to defendant's interrogatory nos. 14, 15 or 16, then I request authorizations be signed by Dr. Lin and completed for those who would be identified in response to those interrogatories and returned to me by April 21, 2003. The reason for that request is the time it takes to obtain medical records.

Very truly yours,


Raymond A. Kresge

RAK/rlt

Enclosures

AUTHORIZATION FOR RELEASE OF
MEDICAL, PSYCHIATRIC, HOSPITAL & COUNSELING RECORDS

TO:

You are hereby authorized to furnish and release to Rohm and Haas Company and its lawyers at the law firm of Klett Rooney Lieber & Schorling any and all medical, psychiatric, hospital and counseling records, including but not limited to, confidential documents bearing sensitive diagnoses, itemized bills, medical reports, notes, complete hospital records and/or office records including, without limitation, nurses' notes, order sheets, progress notes, history and physical examination documentation, medication sheets, laboratory reports, consultation reports, attendance records and discharge summaries covering findings and treatment rendered to Dr. Manhua Mandy Lin (Social Security No. 063-68-5968), as well as any other information related to my medical, physical or mental condition. This authorization includes the right to inspection and copying. I further release any hospital, physician, psychologist, health care worker, therapist and social worker and any of their employees from any and all liability for furnishing said information to the aforesaid persons. My agreement to this release is voluntary.

MANHUA MANDY LIN

DATE